



DOLLARS & SENSE A PROCUREMENT PERSPECTIVE

FORT BRAGG, NORTH CAROLINA
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USE of GSA and Other non-DoD CONTRACTS

The use of non-DoD contract vehicles is encouraged when they are the best method to acquire supplies and services to meet DoD needs. However, a number of policies and procedures have been implemented recently to ensure that non-DoD contract vehicles are properly used.

Written Approval – Effective Jun 04, a DoD contracting officer must approve *in writing* that a contract or order placed against a non-DoD contract vehicle is in the best interests of the Department of Defense.

Compliance – Prior to approving the use of a non-DoD contract vehicle, contracting officers must ensure that contracts or orders are in compliance with all applicable statutes, regulations, directives and other requirements. Therefore, DoD contracting officers approving the use of any type of non-DoD contracts must be familiar with the requirements of the basic contract. Contracting officers are also responsible for providing, to the assisting agency, any unique requirements associated with the acquisition (e.g.

the statutory provision that requires DoD to procure only U.S. made clothing).

Type of Funding – Although DoD contracting officers are ultimately responsible to ensure that tasks to be accomplished or supplies to be acquired are consistent with the *types of funding* to be utilized, the entire acquisition team (e.g. program managers, facilities managers, business managers, finance managers) must all take part in the effort and provide any support or input needed to ensure that the missions of DoD are met.

Assisted Acquisition means a contract awarded or task or delivery order placed on behalf of DoD by an official of the United States *outside* the Department of Defense.

Best Method Factors to be considered in determining whether or not utilizing a non-DoD contract vehicle is in the best interest of the Department include: meeting customer requirements, schedules, cost effectiveness, and Economy Act compliance.

Approval Levels when procuring *supplies* or *services* using a non-DoD contract are:

(a) Before placing *any* order against a non-DoD contract vehicle, with the exception of purchases made on a purchase care, a written determination must be made by a DoD contracting officer that the placement of the task/delivery order is in the best interests of the Department of Defense.

(b) Task/delivery orders for services/supplies valued over \$5 million up to \$50 million, placed on behalf of the DoD by an official of the United States *outside* the DoD requires approval by the Head of the DoD Contracting Activity. Authority to grant this approval may be delegated.

(c) Task/delivery orders valued at \$50 million or above, placed against a non-DoD contract vehicle, require approval of the Senior Procurement Executive. (ASD AT&L Policy Memo dtd Jun 04).

CO-SPONSORSHIP AGREEMENTS

The Joint Ethics Regulation, DoD 5500.7-R (JER) provides that DoD component commands and organizations may enter into co-sponsorship

arrangements with private organizations; however, fiscal and ethical limitations remain in place and must be observed by commands and organizations which enter into co-sponsorship agreements. Recent inquiries by DoD into the legality of co-sponsored conferences between the military services and private organizations has revealed many instances in which commands and organizations have entered into co-sponsorship agreement with a private organization where provisions in the agreement were in *direct violation* of fundamental fiscal and ethical principles.

Approved – To ensure that Army commands and organizations comply with fiscal and ethical laws and regulations, *all* co-sponsorship agreements must obtain the approval of the Designated Agency Ethics Official or the Alternate Designated Agency Ethics Official.

Written and Signed – Requirements of a proper co-sponsorship are found in the JER at paragraph 3-206. All agreements must be in writing and must have the signature of the representative of both parties to the agreement.

Official Copy – Upon review of the agreement by the designated ethics counselor for the command or organization, the completed agreement must be forwarded to the Department of Army, Office of the General Counsel, Washington, DC. Without such approval, the co-sponsorship is improper.

A Proper Invoice

Listed below are the elements required on a proper invoice (FAR 32.905(b)). The underscored bolded items cause the vast majority of DFAS Rome Vendor Pay invoice returns.

Content - A proper invoice must include the following items (except for interim payments on cost reimbursement contracts for services):

- (a) Name and address of the contractor.
- (b) **Invoice date and invoice number.**
- (c) **Contract number** or other authorization for supplies delivered or services performed (including order number and **contract line item number**).

(d) Description, quantity, unit of measure, unit price, and extended price of supplies delivered or services performed.

(e) Shipping and payment terms

(f) Name and address of contractor official to whom payment is to be sent (must be the same as that in the contract or in a proper notice of assignment).

(g) Name, title, phone number, and mailing address of person to notify in the event of a defective invoice.

(h) Taxpayer Identification Number (TIN). The contractor must include its TIN on the invoice only if required by agency procedures. (See 4.9 TIN requirements.)

(i) Electronic funds transfer (EFT) banking information (only if required by agency procedures).

(j) Any other information or documentation required by the contract (*e.g.*, evidence of shipment).

Wide Area Workflow (WAWF) - The best way to insure timely payments is invoice submission through Wide Area Workflow (WAWF), which requires the listed elements upon transmission.

Currently WAWF is used for contract payments only. DFAS Rome, as well as many other DFAS locations, is accepting invoices via WAWF. Rome's Point of Contact for WAWF is Diane Morczek. She can be reached at (315) 330-6800 or email diane.morczek@dfas.mil.

Information about WAWF and registration instructions is located at <https://wawf.eb.mil>. If you choose not to use WAWF at this time, please fax invoices to DFAS Rome at 1 877 575-3332.

For additional information concerning any issues, you may contact the DOC at 6-4362.



Director of Contracting